



Twickenham Riverside Development Discussion

August 2022

Twickenham Riverside Trust



The Twickenham Riverside Trust was founded in 2011 with the primary purpose of preserving, protecting and improving for the benefit of the public, the riverside and its environs in Twickenham. We also provide facilities for and host many popular events in the Diamond Jubilee Gardens!



Twickenham Riverside Development Timeline

	2018	2019	2020	2021	2022
Key Milestones	<p>Mar – Planning application for previous scheme granted permission subject to EA compliance</p> <p>May – Planning application withdrawn by LBRuT</p> <p>Oct – Following meetings with LBRuT, TRT undertakes to consider all plans proposed by LBRuT</p> <p>Dec – Stakeholder Reference Group meetings start (TRT a member)</p> <p>Dec – TRT submits its Principles for Development (PfD) document, incorporated in RIBA brief</p>	<p>Feb – TRT confirms willingness to engage with each stage of emerging process</p> <p>Mar – Launch of RIBA competition (though brief missing EA's requirements of Mar 2018 re any riverside development)</p> <p>Sep – Public consultation on designs from 5 shortlisted candidates. TRT confirms Hopkins as its preferred bidder</p> <p>Nov – Hopkins named as preferred bidder</p> <p>Nov -> May 2020 – TRT & LBRuT discussions re Heads of Terms (HoT) which has 2 parts; the terms (e.g. if delays to development) and the reprovision attachment which continued to change with the design through 2019 -> 2021</p>	<p>Jan – TRT confirm would consider provision adhering to PfD</p> <p>Mar – Hopkins appointed</p> <p>May – EA raises significant concerns re flood defences. LBRuT adopt negative screening opinion for an EIA</p> <p>Jun – TRT express concerns; unresolved PLA/EPIA matters, lack of clarity on space, building scale, alignment to requirements. LBRuT issue 'Final Offer'. TRT reject offer.</p> <p>Jul / Aug – LBRuT & Hopkins meet EA re flood defences and realise EA concerns previously raised are significant so redesign required</p> <p>Sep - Oct – LBRuT reveal redesign. TRT, SRG and DP architects identify the 2.5m wall next to riverside as unacceptable. TRT reiterates a solution must be found to its key requirements.</p> <p>Oct / Nov – LBRuT formally proposes CPO at Finance Comm. Mtg. TRT advise against (challenge / cost / delay)</p>	<p>Feb – TRT raise Brownfield error with LBRuT</p> <p>Jun – LBRuT issue plan showing reprovision for DJG and issue draft CPO ★</p> <p>Aug – Initial Surveyor's report received by TRT</p> <p>Sep – LBRuT revises proposal and grounds for CPO so TRT instructed Surveyor to update report</p> <p>Oct / Nov – LBRuT initiates CPO. TRT objects</p> <p>Dec – TRT email LBRuT correcting inaccuracies in Council press release suggesting terms had previously been agreed with TRT</p>	<p>Jan – TRT sets out specific concerns centered on the loss of equal amenity value public open space, the negative impact of Wharf Lane building and the removal of cafe as revenue stream</p> <p>Jan - TRT submit formal complaint that Brownfield (BLR) error remains uncorrected by LBRuT</p> <p>Mar –TRT's BLR complaint rejected by LBRuT at Stage 1. TRT appeal this as decision based on misconceptions and errors</p> <p>May / Jun – LBRuT reject appeal & TRT submit complaint to Ombudsman</p> <p>Aug – TRT formally request LBRuT remove DJG from BLR during 2022 review. TRT remains in discussions with Ombudsman</p>

Challenges facing the council

1. Objection to the CPO & Section 19

- a. The offer fails to meet the statutory requirements as set out in Section 19 of the Acquisition of Land Act 1981
- b. Proposed exchange land does not provide public amenity which is 'equally advantageous' compared to the existing public open space
- c. Various CPO requirements not yet met e.g., neither planning permission nor guaranteed funding secured
- d. The Trust is duty bound to contest the CPO
 - i. The Trust was founded in 2011 with the primary purpose of 'preserving, protecting and improving, for the benefit of the public, the riverside and its environs'
 - ii. The Trust strongly supports the objective of regeneration, the removal of the derelict areas, and other improvements on the Riverside but we have a statutory obligation, as defined by the Charity Commission, to ensure the quantum and quality of public open space which exists today on the Riverside is protected and preserved for the benefit of the public.
 - iii. We have an explicit legal obligation also under our long lease on the Gardens, which has 117 years yet to run.

2. Complaint against the inclusion of the Gardens within the site entered on the Brownfield Land Register in 2017

- a. The Council decided in 2014 that the Gardens should be preserved as 'public open space' but failed to take that into account in 2017 when registering the Diamond Jubilee Gardens as brownfield on the newly created national Brownfield Land Register
- b. The 2013 Local Plan (TAAP) explicitly recommended the retention of the 'public open space' of the Gardens on the site (TW7) and that development should 'adjoin'/'enhance'/'extend' the Gardens rather than build on them
- c. The Council cannot change the plan until the next formal review. The draft new Local Plan is scheduled for consultation in Autumn 2022, with a new Local Plan scheduled for adoption in Autumn 2024

The Trust's perspective

The Council has an opportunity to pivot the scheme to one which better meets the emerging needs of society post COVID and in the face of climate change, to inspire young people and to promote public open space over buildings

1. COVID has highlighted the increasing importance and community value of public open space
2. Building costs have increased since this scheme was selected back in 2019
3. Detailed analysis of the c600 comments on the scheme's August 2021 planning application indicates that the public would support a scheme that gets something done while improving public open space
 - a. Only 5% of approval comments pertain to the buildings in the scheme while;
 - b. Over 40% of objection comments pertain to the buildings in the scheme
 - c. Almost half of all objection comments cannot be addressed without reducing the massing of the buildings
 - d. Young people overwhelmingly supported the scheme with a swimming pool, indicating a huge bias towards useful, active open space rather than buildings
4. Climate change constitutes the biggest issue that the next generation will face in their lifetime, with the Embankment increasingly subject to flooding. The public open space currently protected from flooding should continue to be protected
5. The Trust cannot support the current scheme because, essentially, it places a large residential building at the heart of the development and on the existing Gardens, without offering equivalent coherent public open space matching the existing site in either size or amenity. It offers no material improvement of the Riverside, indeed the removal of the present trees and shrubs will have a damaging environmental impact, which the Council has chosen not to assess. The removal of the present derelict areas on the Riverside (which are all on Council-owned property) can all be achieved through straightforward improvements without changing the present special nature of the public space in this riverfront location – forever.
6. The Trust would support the Council in designing a scheme that allows the Trust to meet its founding principle to preserve, protect and improve, for the benefit of the public, the riverside and its environs

Twickenham Riverside Trust's policy for riverside development

1. The Trust supports improvements to Twickenham Riverside to remove the remaining derelict areas and to open up pedestrian access to the Riverside from the town centre.
2. The Trust supports – and is bound by its founding principles to preserve, protect and improve – the retention of the quantity, quality and open aspect of the public open space that is currently available on the Riverside. It has consistently offered to consider designs which would change the footprint of the existing Diamond Jubilee Gardens, provided that any re-provision respects that fundamental requirement for open space.
3. The Trust has no objection to the section of the Hopkins design which would open up Water Lane, redevelop the three retail units on King Street (the Santander block), and provide same-level pedestrian access to the Gardens from Water Lane and a wider vista towards the Embankment. We note that this part of the proposed development would remove the derelict areas of the old lido buildings and the temporary carpark behind the three retail units.
4. The Trust proposes that the western section of the Hopkins design should be reconsidered so as to increase that amount and coherence of the public open space on both the upper and lower levels of the Riverside. Quite apart from its huge size (out of place in this riverfront location and larger than any building on Twickenham's high street), the presence of the Wharf Lane building is the source of the restrictive flood defence requirements imposed by the Environment Agency, of the loss of green and leisure space above the flood plain, and of the 'crunching' of the available space for pedestrians and cyclists on the Embankment which will be much reduced, particularly in the southwest corner.
5. The required open space could be achieved by changing the present Hopkins design to remove or reduce substantially the Wharf Lane building, which would offer minimal public amenity value compared to its negative size and impact. As a reduction of its footprint and height while retaining this building in the same position would still incur the same EA flood requirements as the present proposal and would not increase sufficiently the size and coherence of the open space provided, the Trust favours its complete removal, perhaps compensated – if necessary – by the introduction of a smaller building elsewhere on the site, for example next to the two front buildings facing the river at the bottom of the Water Lane building.
6. Such a design would avoid the blight of the 2.5m high podium flood-defence wall and retain the full extent and coherence of the existing open space above the flood plain, linking as desired to the parking-free Embankment and the southwest corner. The open and green aspect of the present Gardens – with the overall visual impact of trees and open skies beyond the site itself, and with no loss of sunlight – would be retained and the larger public space would be able to accommodate many more recreational opportunities and activities for residents and visitors than the present design proposal. Views of the river to the west would also be improved significantly.
7. The landscaping of the western side of the development could then be adjusted and improved as considered of value. This would facilitate more planting and green space and many if not all of the mature existing trees on the present site could then be preserved, almost all of which would be lost with the current proposal.
8. All of these suggestions accord with the recommendations made in both the 2013 Twickenham Area Action Plan and in the 2019 RIBA Design Competition design brief.

Overlay of Land Order on Scheme

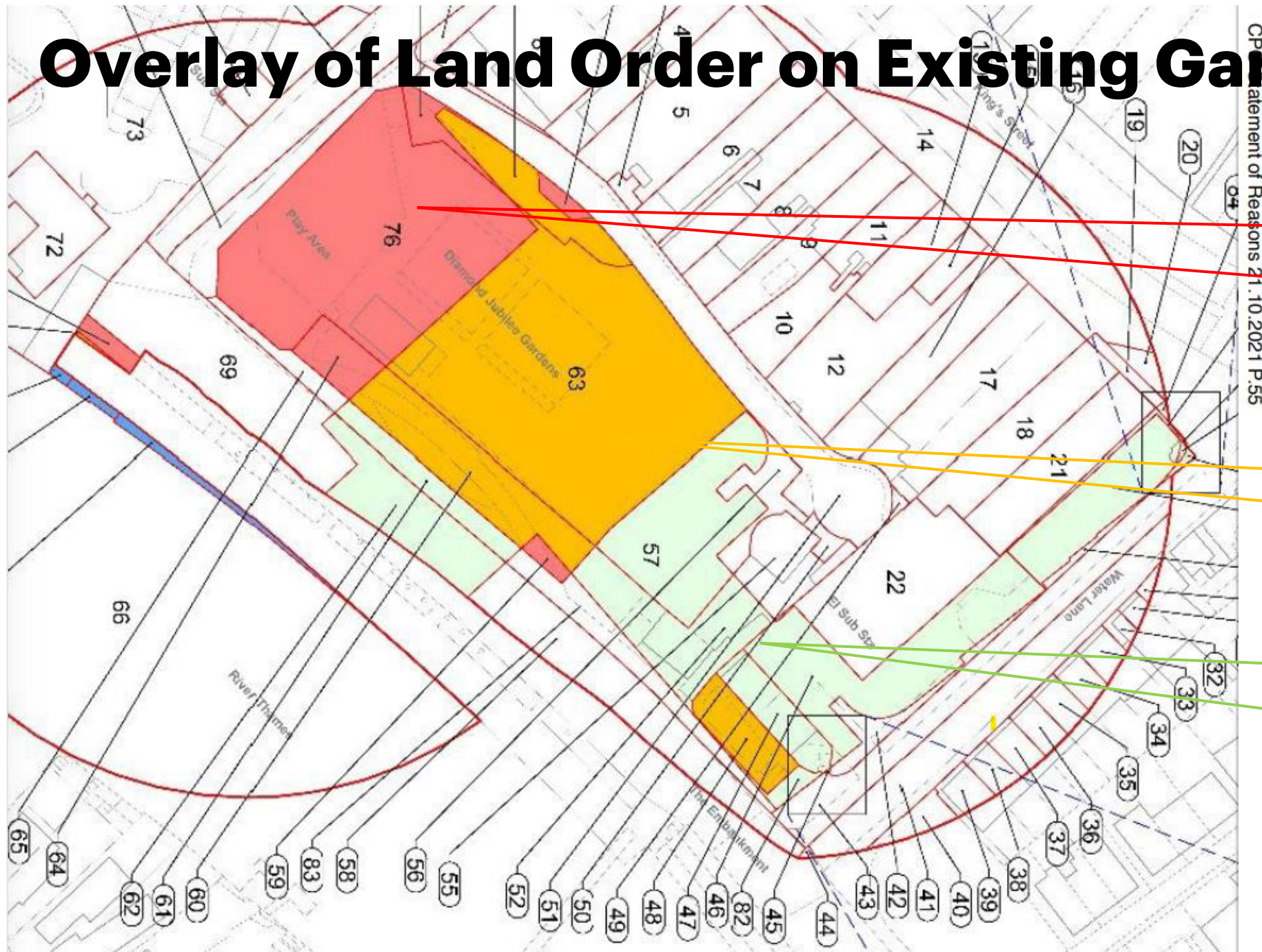


CPO proposes to take this land which would no longer be public open space and would be built on (Wharf Lane building). In the existing Gardens, this area has the Playground and a section of gardens

Section 19 (1) (aa)
Land the CPO proposes to be
taken from the Trust

Section 19 (1) (a)
Land the CPO proposes in
exchange for the area in Red
which would no longer be public
open space

Overlay of Land Order on Existing Gardens



CPO proposes to take this land which would no longer be public open space and would be built on (Wharf Lane building). In the existing Gardens, this area has the Playground and a section of gardens

Section 19 (1) (aa)
Land the CPO proposes to be taken from the Trust

Section 19 (1) (a)
Land the CPO proposes in exchange for the area in Red (ref 76) which in the existing Gardens has the Play Area and a section of gardens